

FILED
IN THE UNITED STATES DISTRICT COURT

FOR THE WESTERN DISTRICT OF TEXAS

SAN ANTONIO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

VS.

RAUL EDWARD SANCHEZ, (1), and
JESSICA LYNN MCKOWN, (2),

Defendants.

CRIMINAL NO. 17-CR-
SA 17CR 968
INDICTMENT **OG**

- 18 USC § 1708
Possession of Stolen Mail
- 18 USC § 1029(a)(2)
Access Device Fraud
- 18 USC § 1028A(a)(1)
Aggravated Identity Theft

THE GRAND JURY CHARGES:

COUNT ONE
[18 U.S.C. § 1708]

On or about September 23, 2017, in the Western District of Texas, the Defendant,

RAUL EDWARD SANCHEZ

did unlawfully have in his possession, certain articles and things, which had been stolen, taken, and abstracted from mail which had been placed in an authorized depository for mail matter in San Antonio, Texas, knowing the same to have been stolen.

All in violation of Title 18, United States Code Section 1708.

COUNT TWO
[18 U.S.C. § 1708]

On or about October 30, 2017, in the Western District of Texas, the exact date of acquisition unknown, the Defendant,

JESSICA LYNN MCKOWN

did unlawfully have in her possession, a certain article and thing, to wit: a Randolph Brooks Federal Credit Union Mastercard with account number ending in 1278, which had been stolen, taken, and abstracted from mail which had been placed in an authorized depository for mail matter in San Antonio, Texas, knowing the same to have been stolen.

All in violation of Title 18, United States Code Section 1708.

COUNT THREE
[18 U.S.C. § 1708]

On or about November 27, 2017, the date of acquisition unknown, in the Western District of Texas, the Defendant,

RAUL EDWARD SANCHEZ AND JESSICA LYNN MCKOWN

did unlawfully possess, articles and things: to wit: approximately 300 pieces of mail, including a Priority Mail 2-Day package bearing USPS tracking number ending in 04 and a First Class package bearing USPS tracking number ending in 22, which had been stolen, taken, and abstracted from mail which had been placed in an authorized depository for mail matter in San Antonio, Texas, knowing the same to have been stolen.

All in violation of Title 18, United States Code Section 1708.

COUNT FOUR
[18 U.S.C. § 1029(a)(2)]

On or about and during the one year period, from November 30, 2016 through November 30, 2017, within the Western District of Texas, the Defendant,

RAUL EDWARD SANCHEZ,

did knowingly and with intent to defraud, use one or more unauthorized access devices particularly, to wit: an American Express credit card with an account number ending in 2000 and a Wells Fargo credit card with an account number ending in 5879, and by such conduct affecting interstate commerce, obtain anything of value aggregating \$1,000.00 or more.

All in violation of Title 18, United States Code, Section 1029(a)(2).

COUNT FIVE
[18 U.S.C. § 1029(a)(2)]

On or about and during the one year period, from November 30, 2016 through November 30, 2017, within the Western District of Texas, the Defendant,

JESSICA LYNN MCKOWN,

did knowingly and with intent to defraud, use one or more unauthorized access devices particularly, to wit: a Randolph Brooks FCU Mastercard with an account number ending in 1278 and a Wells Fargo credit card with an account number ending in 5879, and by such conduct affecting interstate commerce, obtain anything of value aggregating \$1,000.00 or more.

All in violation of Title 18, United States Code, Section 1029(a)(2).

COUNT SIX
[18 U.S.C. § 1028A(a)(1)]

On or about October 9, 2017, in the Western District of Texas, the defendant,

RAUL EDWARD SANCHEZ

did knowingly possess and use, without lawful authority, at a MAC store, a means of identification of another person, to wit: the name of that person, during and in relation to

a felony violation of 18 U.S.C. § 1029(a)(2) with regard to a credit card account number ending in 5879, namely, Access Device Fraud, an offense enumerated under 18 U.S.C. § 1028A(c)(4).

All in violation of Title 18 United States Code Section 1028A(a)(1).

COUNT SEVEN
[18 U.S.C. § 1028A(a)(1)]

On or about October 9, 2017, in the Western District of Texas, the defendant,

JESSICA LYNN MCKOWN

did knowingly possess and use, without lawful authority, a means of identification of another person, to wit: the name of that person, during and in relation to a felony violation of 18 U.S.C. § 1029(a)(2) with regard to a credit card number ending in 5879, namely, Access Device Fraud, an offense enumerated under 18 U.S.C. § 1028A(c)(4).

All in violation of Title 18 United States Code Section 1028A(a)(1).

COUNT EIGHT
[18 U.S.C. § 1028A(a)(1)]

On or about October 9, 2017, in the Western District of Texas, the defendant,

RAUL EDWARD SANCHEZ

did knowingly possess and use, without lawful authority, at an H.E.B. store, a means of identification of another person, to wit: the name of that person, during and in relation to a felony violation of 18 U.S.C. § 1029(a)(2) with regard to a credit card account number ending in 5879, namely, Access Device Fraud, an offense enumerated under 18 U.S.C. § 1028A(c)(4).

All in violation of Title 18 United States Code Section 1028A(a)(1).

A TRUE BILL


[REDACTED] FOREPERSON OF THE GRAND JURY

JOHN F. BASH
UNITED STATES ATTORNEY

BY:


THOMAS P. MOORE
Assistant United States Attorney